

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

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SOUTHWESTERN PAYROLL SERVICE, INC. :

Plaintiff,

v.

PIONEER BANCORP INC.; PIONEER BANK;
MICHAEL T. MANN; VALUEWISE
CORPORATION d/b/a APOGEE d/b/a OPTIX
CONSULTING, and d/b/a PRIMACY SEARCH
GROUP; MYPAYROLLHR.COM, LLC; CLOUD
PAYROLL LLC; ROSS PERSONNEL
CONSULTANTS, INC., ALWAYS LIVE
HOLDINGS, LLC; KANINGO, LLC; HIRE FLUX,
LLC; HIRE FLUX HOLDINGS, LLC; VIVERANT
LLC and HEUTMAKER BUSINESS ADVISORS,
LLC,

Defendants.

Case No. 1:19-cv-1349 (FJS/CFH)

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NATIONAL PAYMENT CORPORATION, :

Intervenor-Plaintiff,

v.

PIONEER BANCORP INC.; PIONEER BANK;
MICHAEL T. MANN; VALUEWISE
CORPORATION MYPAYROLLHR.COM, LLC;
CLOUD PAYROLL LLC; ROSS PERSONNEL
CONSULTANTS, INC., ALWAYS LIVE
HOLDINGS, LLC; KANINGO, LLC; HIRE FLUX,
LLC; HIRE FLUX HOLDINGS, LLC; VIVERANT
LLC and HEUTMAKER BUSINESS ADVISORS,
LLC,

Defendants.

MOTION FOR ADMISSION PRO HAC VICE

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Tara D. Zickefoose, of the firm Baum, Glass, Jayne, Carwile & Peters, pursuant to Local Rule 83.1(d), respectfully moves the Court to be admitted *pro hac vice*, to represent Plaintiff Southwestern Payroll Service, Inc. in this matter. Pursuant to Local Rule 83.1(d), the undersigned counsel has attached and/or will contemporaneously be submitting the completed Verified Petition for Admission Pro Hac Vice; Declaration of Sponsor; Attorney E-Filing Registration Form; Certificate of Good Standing; and will submit payment of the required *pro hac vice* admission fee of \$100.00.

WHEREFORE, premises considered, the undersigned respectfully moves this Court to be admitted *pro hac vice*, to represent Plaintiff Southwestern Payroll Service, Inc. in this matter.

Respectfully submitted,

s/ Tara D. Zickefoose

Andrew C. Jayne, OBA # 19493
Tara D. Zickefoose, OBA #31757
BAUM GLASS JAYNE CARWILE & PETERS
Mid-Continent Tower
401 S. Boston, Suite 2000
Tulsa, OK 74103
Telephone: (918) 938-7944
ajayne@bgjclaw.com
tzickefoose@bgjclaw.com

By:

s/ Michael A. Kornstein

Michael A. Kornstein, Esq.
Bar Roll No. 103178
COOPER ERVING & SAVAGE LLP
LOCAL COUNSEL FOR PLAINTIFF
39 North Pearl Street, 4th Floor
Albany, NY 12207
Telephone: (518) 449-3900
mkornstein@coopererving.com

CERTIFICATE OF SERVICE

I hereby certify that on Friday, April 16, 2021, I electronically transmitted the previous document to the Clerk of the Court using the ECF System for filing and transmittal of Notice of Electronic Filing was then made to the following ECF registrants:

Michael A. Kornstein – mkornstein@coopererving.com
Local Counsel for Plaintiff Southwestern Payroll Service, Inc.

Stephen J. Pontius – spontius@ahn-law.com
PHV for Plaintiff Southwestern Payroll Service, Inc.

Walter D. Haskins – whaskins@ahn-law.com
PHV for Plaintiff Southwestern Payroll Service, Inc.

Robert J. Alessi – Robert.alessi@us.dlapiper.com
Jeffrey D. Kuhn – Jeffrey.kuhn@us.dlapiper.com
Counsel for Defendant Pioneer Bancorp, Inc., Pioneer Bank

Cynthia E. Neidl – neidlc@gtlaw.com
Counsel for non-party National Payment Corporation

s/ Rebecca O. Humance